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16 Attorneys for Plaintiff  
17 Russell Road Food and Beverage, LLC

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 SOUTHERN DIVISION

21 RUSSELL ROAD FOOD AND  
22 BEVERAGE, LLC,

23 Plaintiff,

24 vs.

25 MIKE GALAM, et al.

26 Defendants.

27 MIKE GALAM, et al.,

28 Counterclaimants,

vs.

RUSSELL ROAD FOOD AND  
BEVERAGE, LLC, et al.

Counterdefendant.

Case No. 2:13-cv-00776-RFB-NJK

**STIPULATED REQUEST FOR ADDITIONAL  
TIME TO SUBMIT PROPOSED JOINT  
DISCOVERY AND SCHEDULING ORDER**

Case Filed: May 2, 2013

Judge: Honorable Richard F. Boulware

1 On February 28, 2018, this Court held a hearing on the following motions:

- 2 • Defendants Mike Galam, Victor Galam, Jacqueline Galam Barnes, Crazy  
3 Horse Too Gentlemen's Club LLC, Rhino Bare Projects LLC, and Rhino  
4 Bare Projects 4824 LLC's (the "Galam Defendants") Motion for  
5 Reconsideration (ECF No. 336);
- 6 • Defendants Canico Capital Group, LLC and Industrial Road 2440-2497,  
7 LLC's (the "Canico Defendants") and Defendants Abraham Assil, George  
8 Eshaghian, West Best Capital Group, LLC, SN & GE, LLC, and Soleiman  
9 Nazarian's (the "Assil Defendants") Motion for Reconsideration (ECF No.  
10 337);
- 11 • Defendants Djavid Hakakian, Morris Nejathaim, Hamed Yazdanpanah,  
12 Isaac Javdanfar, Kamran Samoooha, Mehran Sadighpour, Sefox  
13 Investment, LLC, El Marino, LLC, Knotting Hill, LLC, IJ Properties, LLC, and  
14 S Double, LLC's (the "Hakakian Defendants") Motion for Reconsideration  
15 (ECF No. 339);
- 16 • Plaintiff Russell Road Food and Beverage, LLC's ("Russell Road") Cross-  
17 Motions for Summary Judgment against the Galam Defendants, Canico  
18 Defendants, Assil Defendants, and Hakakian Defendants (ECF Nos. 346,  
19 348, and 351); and
- 20 • Plaintiff Russell Road's Motion for Preliminary Injunction (ECF No. 361).

21 At the hearing, the Court took the motions under submission and ordered the parties to  
22 submit a proposed joint discovery and scheduling order.

23 On March 12, 2018, the Court issued a Minute Order providing as follows:

24 IT IS ORDERED that the parties shall submit a Joint  
25 Proposed Discovery/Scheduling Order for this Court's  
26 consideration due by two weeks. The Scheduling Order  
27 should include six to nine months of discovery with a motion  
28 calendar as it relates to dispositive motions regarding the  
issue of personal liability which can address the period of  
infringement and damages. IT IS FURTHER ORDERED that  
the parties are directed to electronically file in CM/ECF, a  
joint letter for this Court's consideration regarding any

1                   disputed discovery issues. The parties are then directed to  
2                   notify the courtroom deputy as to scheduling a status  
                    conference hearing.

3                   ECF No. 373. Pursuant to the Court's Minute Order, the Joint Proposed Discovery and  
4                   Scheduling Order was due on March 14, 2018.

5                   At present, the parties are unable to agree on the language of a Joint Proposed  
6                   Discovery and Scheduling Order and are in the process of attempting to negotiate  
7                   mutually acceptable language. The parties respectfully request additional time to  
8                   submit the Joint Proposed Discovery and Scheduling Order.

9                   The parties propose that they be given until April 3, 2018 to submit a Joint  
10                  Proposed Discovery and Scheduling Order and that, if the parties are unable to reach  
11                  agreement on a Joint Proposed Discovery and Scheduling Order by April 3, 2018, the  
12                  parties shall each submit their own proposed Discovery and Scheduling Order by April  
13                  6, 2018 for the Court's consideration.

14  
15                  **IT IS SO STIPULATED**

16  
17                  Dated: March 26, 2018

Respectfully submitted,

18                  TMW LAW

19  
20                  By           /s/ Bruno Tarabichi            
21                               Bruno Tarabichi  
22                               Attorneys for Plaintiff  
23                               Russell Road Food and Beverage, LLC  
24  
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27  
28

1 Dated: March 26, 2018

Respectfully submitted,

2 LAMBROSE BROWN PLLC

3  
4 By /s/ William Brown

5 William Brown  
6 Attorneys for Defendants Mike Galam,  
7 Crazy Horse Too Gentlemen's Club LLC,  
8 Victor Galam, Jacqueline Galam Barnes,  
9 Rhino Bare Projects LLC, and Rhino Bare  
10 Projects 4824 LLC

11 Dated: March 26, 2018

Respectfully submitted,

12 AKERMAN LLP

13 By /s/ Ariel E. Stern

14 Ariel E. Stern  
15 Attorneys for Defendants Canico Capital  
16 Group, LLC, Industrial Road 2440-2497,  
17 LLC, Abraham Assil, George Eshaghian,  
18 West Best Capital Group, LLC, SN & GE,  
19 LLC, and Soleiman Nazarian

20 Dated: March 26, 2018

Respectfully submitted,

21 LEBEDEV, MICHAEL & HELMI

22 By /s/ Gennady L. Lebedev

23 Gennady L. Lebedev  
24 Attorneys for Defendants Djavid  
25 Hakakian, Morris Nejathaim, Hamed  
26 Yazdanpanah, Isaac Javdanfar, Kamran  
27 Samoocha, Mehran Sadighpour, Sefox  
28 Investment, LLC, El Marino, LLC,  
Knotting Hill, LLC, IJ Properties, LLC, and  
S Double, LLC

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IT IS SO ORDERED:

  
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HON. RICHARD F. BOULWARE  
UNITED STATES DISTRICT JUDGE

DATED: March 28, 2018.